

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (BOSTON)**

CHARLES BROWN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER, and
 JAMES MULLEN,

Defendants.

1:05-cv-10400 (RCL)

CARY GRILL, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER and
JAMES MULLEN,

Defendants.

1:05-cv-10453 (RCL)

ROCHELLE LOBEL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

VS.

BIOGEN IDEC, INC., WILLIAM RASTETTER and
JAMES MULLEN,

Defendants.

**DECLARATION OF NANCY FREEMAN GANS IN SUPPORT OF THE MOTION
OF THE BIOGEN INSTITUTIONAL INVESTOR GROUP FOR CONSOLIDATION,
APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL**

I, Nancy Freeman Gans, under penalties of perjury, hereby declares:

1. I am a partner of the law firm of Moulton & Gans, P.C. ("Moulton & Gans"). I submit this declaration in support of the motion of the Biogen Institutional Investor Group for Consolidation, Appointment As Lead Plaintiff, And Approval Of Lead Plaintiff's Selection Of Co-Lead Counsel and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the first published PSLRA notice by plaintiff in the action *Brown v. Biogen Idec, Inc., et al.* No. 1:05-cv-10400 (RCL) (D. Mass. filed on March 2, 2005). Notice was published on the *PR Newswire*.

3. Attached hereto as Exhibit B are true and accurate copies of the certifications of The New Jersey Carpenters Pension and Annuity Funds, Folksom Asset Management, Third Millennium Trading, LLP, the Deerfield Beach Non-Uniformed Municipal Employees Retirement Plan and the Plumbers and Pipefitters Local No. 520 Pension Fund (collectively, the "Biogen Institutional Investor Group").

4. Attached hereto as Exhibit C is a chart analyzing the Biogen Institutional Investor Group's financial interest in this action.

5. Attached hereto as Exhibit D is the firm resume of Milberg Weiss Bershad & Schulman LLP.

6. Attached hereto as Exhibit E is the firm resume of Entwistle & Cappucci, LLP.

7. Attached hereto as Exhibit F is the firm resume of Moulton & Gans, P.C.

Dated: May 2, 2005
New York, New York

/s/ Nancy Freeman Gans
NANCY FREEMAN GANS

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party.

/s/ Nancy Freeman Gans
Nancy Freeman Gans